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_	Nevada Bar Number 14853			
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8	UNITED STATES DISTRICT COURT			
9	DISTRICT C	OF NEVADA		
,	UNITED STATES OF AMERICA,	Case No.: 2:20-cr-00273-JCM-BNW		
10				
11	Plaintiff,	Stipulation for Extension of Time		
11	vs.	(First Request)		
12	v3.			
	THOMAS RONALD HOOVER,			
13				
14	Defendant.			
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15				
	IT IS HEREBY STIPULATED AND A	GREED, by and between Christopher Chiou,		
16	United States Attorney and Andrew W. Dunce	n Assistant United States Attorney sourced for		
17	United States Attorney, and Andrew W. Dunca	n, Assistant Officed States Attorney, counsel to		
`	the United States of America, and Katherine Ta	naka, Assistant Federal Public Defender,		
18				
	counsel for Defendant Thomas Ronald Hoover,	that the date for the Government to file a		
19	response to the Defendant's Motion to Suppress	(ECF No. 54) he extended for fourteen days		
20	response to the 2 conduit of rection to suppress	(201 1101 bil) be entended for fedicion days,		
	specifically to February 28, 2022.			
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22	This stipulation is entered for the following	ng reasons:		
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1	1.	The Defendant's Motion to Suppress was filed and served on January 31, 2022.
2		See ECF No. 54. The Government's response deadline is presently February 14,
3		2022.
4	2.	Counsel for the Government was recently assigned to handle the case due to the
5		departure from the office of original Government counsel.
6	3.	Government Counsel needs additional time to conduct investigation and
7		research to adequately respond to the Defendant's motion.
8	4.	The additional time requested herein is not sought for purposes of delay, but to
9		allow counsel for the Government time to adequately respond to the Defendant's
10		motion.
11	5.	Additionally, denial of this request for continuance could result in a miscarriage
12		of justice.
13	6.	This is the first stipulation filed herein to continue the Government's response
14		deadline.
15	7.	The parties agree to the extension of time.
16	DATI	ED: February 9, 2022
17	Resne	ectfully submitted,
18	_	STOPHER CHIOU
19		g United States Attorney
20	/s	/ Andrew W. Duncan /s/ Katherine Tanaka
21		REW W. DUNCAN ant United States Attorney KATHERINE TANAKA Counsel for Defendant
22	Assist	Thomas Ronald Hoover
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2	TO MADE ON THE DISCUSSION OF THE		
3	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA		
4	***		
5			
6	UNITED STATES OF AMERICA,) 2:20-cr-00273-JCM-BNW		
7	Plaintiff,)		
8	v.)		
9	THOMAS RONALD HOOVER,		
10	Defendant.))		
11			
12	FINDINGS OF FACT		
13	Based on the pending Stipulation of counsel, and good cause appearing therefore, the		
14	Court finds that:		
15	1. The Defendant's Motion to Suppress was filed and served on January 31, 2022.		
16	See ECF No. 54. The Government's response deadline is February 14, 2022.		
17	2. Counsel for the Government needs additional time to conduct investigation and		
	research to adequately respond to the Defendant's motion.		
18	3. The additional time requested herein is not sought for purposes of delay, but to		
19	allow counsel for the Government time to adequately respond to the Defendant's		
20	motion.		
21	4. Additionally, denial of this request for continuance could result in a miscarriage		
22	of justice.		
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1	5. This is the first stipulation filed herein to continue the Government's response
2	deadline.
3	6. The parties agree to the extension of time
4	For all of the above-stated reasons, the ends of justice would best be served by a
5	continuance of the Government's response deadline.
6	CONCLUSIONS OF LAW
7	The additional time requested herein is not sought for purposes of delay, but to allow the
8	Government adequate time to respond to the Defendant's motion. The failure to grant said
9	continuance would likely result in a miscarriage of justice.
10	<u>ORDER</u>
11	IT IS THEREFORE ORDERED that the previously scheduled response deadline for
12	the Government to respond to the Defendant's Motion to Suppress is extended until February
13	28, 2022.
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15	DATED this 10th day of February 2022.
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17	HONORABLE BRENDA WEKSLER
18	UNITED STATES MAGISTRATE JUDGE
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